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January 19, 2021

BY ECF AND EMAIL

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: United States v. Daniel Spiegelman
20 Cr. 609 (JPC)

Dear Judge Cronin,

I respectfully write on behalf of my client, Daniel Spiegelman, to request that his sentencing hearing scheduled for February 16, 2021 at 11:00 AM, be conducted remotely, either by phone or video conference. I have spoken with Mitzi Steiner, Esq., on behalf of the Government, and she consents to this request.

We believe that a remote sentencing procedure is consistent with the CARES Act and warranted in light of the growing threat of COVID-19. Mr. Spiegelman is currently serving the remainder of his sentence on the underlying Escape charge. If he were to personally appear in court, he would be mandated to quarantine for 14 days upon his return to MCC, which he hopes to avoid. At sentencing, we anticipate requesting a sentence of Time Served based on the nature of the charges and Mr. Spiegelman's 3553(a) factors. This would not result in his release, as he continues to complete his underlying sentence.

Respectfully submitted,
/S/
Robert M. Baum
Assistant Federal Defender

cc: Mitzi Steiner, Esq.
Assistant United States Attorney